

## **Exhibit Q**

### **Email re Communications with Balestrieri**

## Suzanne Elovecky

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**From:** Kate Klaus <KKlaus@maddinhauser.com>  
**Sent:** Tuesday, July 11, 2023 3:42 PM  
**To:** Suzanne Elovecky  
**Cc:** Neil Nicholson; Cooper, Howard; Joseph M. Cacace (jcacace@toddweld.com)  
**Subject:** [EXTERNAL] RE: de Laire v. Church Militant, et al

Suzanne -

There have been no communications between my clients or me on the one hand and Marc on the other hand since June 15, other than what you've been copied on by way of emails from me and the text message we produced.

A SMM employee (the intermediary in the text message we produced) is a current client of Marc on an on-going canonical matter. In response to your email below, I asked Mr. Voris to reach out to this employee and ask him whether he had any communications with Marc since June 15. This employee confirmed that he did communicate with Marc about his canonical case on July 1. Apparently, in that conversation, Marc told this employee in passing that Marc was not going to Boston for his deposition. The SMM employee did not communicate this to Mr. Voris or anyone else, until we spoke to him this afternoon in response to your request. To the best of our knowledge, no other employee had any communications with Marc about any topic since June 15.

- Kate

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**From:** Suzanne Elovecky <selovecky@psh.com>  
**Sent:** Tuesday, July 11, 2023 2:54 PM  
**To:** Kate Klaus <KKlaus@maddinhauser.com>  
**Cc:** Neil Nicholson <neil@nicholson-lawfirm.com>; Cooper, Howard <hcooper@toddweld.com>; Joseph M. Cacace (jcacace@toddweld.com) <jcacace@toddweld.com>  
**Subject:** de Laire v. Church Militant, et al

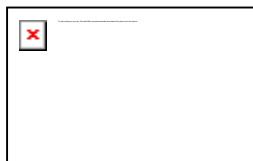
[EXTERNAL EMAIL]

Kate –

Please confirm that you have told us about all communications between you and your clients on the one hand, and Mr. Balestrieri on the other hand, particularly since he signed the stipulation agreeing to appear in Boston for his deposition.

If there is anything else we should know about, now is the time for you to tell us.

Thank you,



**Suzanne M. Elovecky**  
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